UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF INDIANA INDIANAPOLIS DIVISION

JUDICIAL WATCH, INC., et al.,)	
)	
Plaintiffs,)	
)	
v.)	1:12-cv-800-WTL-TAF
)	
J. BRADLEY KING, et al.,)	
)	
Defendants.)	

DEFENDANTS' NOTICE OF INITIAL EXTENSION OF TIME TO RESPOND TO DISCOVERY REQUESTS

Defendants J. Bradley King and Trent Deckard, Co-Directors of the Indiana Election Division, and Connie Lawson, Indiana Secretary of State, by counsel, pursuant to Southern District of Indiana Local Rule 6.1(b), hereby notifies the Court and the parties that the time within which the Defendants are to respond to the discovery requests is extended 28 days to February 3, 2013, and in support state as follows:

- 1. On December 7, 2012, Plaintiffs requested that Defendants produce various documents and answer interrogatories within thirty days.
- 2. Accordingly, the deadline for Defendants to respond to Plaintiffs' request is January 6, 2013. That deadline has not passed.
- 3. Undersigned counsel contacted Defendants' counsel, Chris Fedeli, on January 4, 2013. Mr. Fedeli stated that he had no objection to the 28-day extension of time to respond to discovery.
- 4. The discovery requests served on Defendants include extensive requests for numerous documents. Defendants anticipate requesting further extensions of time to respond to

Plaintiffs' discovery requests, and notified Plaintiffs they expect to request additional time to fully comply with Plaintiffs' requests.

Pursuant to Southern District of Indiana Local Rule 6.1(b), Defendants' responses to Plaintiffs' discovery requests are due on or before February 3, 2013.

Respectfully submitted,

GREGORY F. ZOELLER Indiana Attorney General Attorney No. 1958-98

By: <u>/s/ Jefferson S. Garn</u> Jefferson S. Garn Deputy Attorney General Attorney No. 29921-49

CERTIFICATE OF SERVICE

I hereby certify that on this 4th day of January, 2013, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system. Notice of this filing will be sent to the counsel of record by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

Paul J. Orfanedes
JUDICIAL WATCH, INC.
porfanedes@judicialwatch.org

David R. Langdon LANGDON LAW LLC dlangdon@langdonlaw.com Chris Fedeli JUDICIAL WATCH, INC. cfedeli@judicialwatch.org

Joshua B. Bolinger LANGDON LAW LLC jbolinger@langdonlaw.com

/s/ Jefferson S. Garn
Jefferson S. Garn
Deputy Attorney General

Office of the Indiana Attorney General Indiana Government Center South, 5th Floor 302 W. Washington Street Indianapolis, IN 46204-2770 Telephone: (317) 232-6292

Fax: (317) 232-7979 Email: jefferson.garn@atg.in.gov